Blenheim Estates

37-41 BRIGHTON ROAD, SHOREHAM-BY-SEA

Preliminary Ecological Appraisal

UK-70118838
MAY 2025

PUBLIC

Blenheim Estates

37-41 BRIGHTON ROAD, SHOREHAM-BY-SEA

Preliminary Ecological Appraisal

TYPE OF DOCUMENT (VERSION) PUBLIC

PROJECT NO. UK-70118838

OUR REF. NO. UK-70118838

DATE: MAY 2025

WSP

2 London Square
Cross Lanes
Guildford, Surrey
GU1 1UN

Phone: +44 148 352 8400

WSP.com

QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Draft for comment	Minor update		
Date	October 2024	May 2025		
Prepared by	Jack Peacock	Jack Peacock		
Signature		Jack.Peacock@wsp.com Digitally signed by Jack.Peacock@wsp.com DN: cn=Jack.Peacock@wsp.com Date: 2025.05.16 14:57:29 +01'00'		
Checked by	Verity Dickie	Verity Dickie		
Signature		verity.dickie@wsp.com Digitally signed by verity.dickie@wsp.com DN: cn=verity.dickie@wsp.com Date: 2025.05.16 14:58:55 +01'00'		
Authorised by	Charlotte Hewitt	Verity Dickie		
Signature		verity.dickie@wsp.com Digitally signed by verity.dickie@wsp.com DN: cn=verity.dickie@wsp.com Date: 2025.05.16 14:59:23 +01'00'		
Project number	UK-70118838	UK-70118838		
Report number	001	001		
File reference	\\uk.wspgroup.com\central data\Projects\70118xxx\70118838 - Brighton Road, Shoreham\03 WIP\Ecology\PEA			

CONTENTS

TABLES

FIGURES

APPENDICES

EXECUTIVE SUMMARY

WSP was commissioned by Blenheim Estates to undertake a Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) of a car servicing and repair garage on Brighton Road, Shoreham-by-Sea (hereafter the 'Site'). Under current proposals, the existing on-Site unit would be demolished and a new residential block with up to 50 units would replace it (hereafter the 'Proposed Development'). Blenheim estates are seeking outline planning permission from Adur District Council for consent for only the access and scale of the development at this stage.

The desk study was undertaken in August 2024 to review existing baseline ecological information available relating to designated sites and protected species in the public domain, and to obtain information held by third parties. The Site is located 0.63km west of the Adur Estuary Site of Special Scientific Interest (SSSI), a site of national importance which is subject to strict protection under the Wildlife and Countryside Act 1981 (as amended). Due to the proximity to the SSSI and the nature of the Proposed Development (50 new residential units), consultation with Natural England prior to the commencement of the development will be required. Three Local Nature Reserves (LNRs) and one National Park, also sites of national importance, were identified during the desk study. Three Local Wildlife Sites (LWS) and three Designated Road Verges (DRVs) were present within 2km of the Site. With relevant best practice measures and precautionary method of works, long term or permanent negative impacts as a result of the Proposed Development are not anticipated at any of the sites.

A UK Habitat Classification (UKHab) survey of the Site was undertaken in August 2024 in overcast conditions. Three primary habitats were identified within the Site, with the majority comprising 'u1b6 – Other developed land', mostly in the form of hardstanding. None of the on-Site habitats qualify as habitats of principal importance, and there are no waterbodies on or within 10m of the Site. A small verge of 'g4 – Modified grassland' is present to the north of the Site but has limited suitability for protected species.

The PBRA identified a building on site with nine potential roosting features for bats, giving an overall 'Low' bat roosting suitability. No other buildings, structures or trees were identified within the Site boundary.

Further survey has been recommended for bats, with nesting bird checks recommended prior to any demolition works. Further assessment comprising an Ecological Impact Assessment will be required. If final designs indicate that more than 25 square metres of on-site habitats are to be impacted, a Biodiversity Net Gain Assessment will be required. Specific avoidance and mitigation measures have been recommended and are outlined within this report.

on the project to which it relates, and bears no responsibility or liability related to its use other than as set out within the scope of the contract under which it was supplied.

1 INTRODUCTION

1.1 BACKGROUND

1.1.1. WSP was commissioned by Blenheim Estates to undertake a Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) of a car servicing and repair garage located on Brighton Road, Shoreham-by-Sea (Central OS Grid Reference TQ 22212 05113) (hereafter referred to as the 'Site'). An indicative Site boundary is shown in **Figure 1**.

1.1.2. The current proposals include the demolition of the existing on-Site unit and the development of a new residential block of approximately 50 units within the established Free Wharf masterplan area. This will hereafter be referred to as the 'Proposed Development'.

1.1.3. Outline planning permission will be sought from Adur District Council to, at this stage, seek consent for only the access and scale of the development.

1.2 SCOPE OF REPORT

1.2.1. Blenheim Estates commissioned WSP to complete a combined PEA and PBRA of the Site in July 2024. A PEA and PBRA was carried out to meet the brief.

1.2.2. This Preliminary Ecological Appraisal Report (PEAR) presents the findings of the PEA and has been prepared with reference to current good practice guidance published by the Chartered Institute for Ecology and Environmental Management (CIEEM) in relation to PEAs, report writing and Ecological Impact Assessment (EcIA) (CIEEM, 2017a, 2017b and 2018) and guidance contained in the British Standard for biodiversity (British Standards Institution (BSI), 2013).

1.2.3. A PEA aims to:

- Provide baseline ecological information about the Site and a surrounding study area with particular reference to ecological features that could be affected by the Proposed Development and therefore form key considerations in the design of the proposals. Ecological features include designated sites[1], and protected or priority species and habitats[2]. This includes undertaking a UK Habitat Classification (UKHab) survey to identify and map habitats present within the Site;
- If necessary, provide recommendations for further surveys and/or design changes to enable compliance with relevant nature conservation legislation and planning policy; and

[1] As defined in Box 14 in CIEEM (2018) Ecological Impact Assessment guidelines.

[2] The terms 'priority habitats' and 'priority species' are used for habitats and species considered as priorities for conservation, as defined in Box 1 in CIEEM (2017a) guidelines for PEAs. It includes for example those listed as local priority on local Biodiversity Action Plans (LBAPs), those listed as national priority such as Species of Principal Importance (SPI) and Habitats of Principal Importance (HPI) and those on red lists, including Birds of Conservation Concern (BoCC) (Stanbury et al., 2021). It should not be confused with priority habitats and species as listed in the EU Habitats Directive, or as previously used to denote those afforded the highest level of priority for conservation under the UKBAP.

- Identify the likely need for avoidance, mitigation, or compensation measures, and to highlight opportunities for enhancement.

1.2.4. The PEA is for use by Blenheim Estates to inform the design of the Proposed Development. It is based on the Site plans and Proposed Development information described in Section 1.1. Any future variations in the Proposed Development may result in the need to update the appraisal.

1.2.5. It is not usually appropriate to submit a PEAR in support of a planning application (CIEEM, 2017a). As the Proposed Development progresses to planning application stage, the PEAR should be superseded by, or appended to, an EcIA report for submission with a planning application. This should include an evaluation of the importance of ecological features and assessment of the significance of effects.

1.2.6. A PBRA aims to identify potential roosting features (PRFs) for bats within any trees and structures within the Site, with the methods and results incorporated into this PEAR.

1.3 RELEVANT LEGISLATION AND POLICY

1.3.1. The PEA has been prepared in the context of the current national policy and legislative framework for nature conservation as summarised in **Appendix A**. Section 4 discusses the implications of the legislation and policy relevant to the Proposed Development. This does not constitute legal advice, and the original legislation should be consulted for details.

1.3.2. The appraisal has been compiled with reference to the following local planning policy documents:

- Adur Local Plan 2017, Adur District Council
- Shoreham Harbour Joint Area Action Plan (JAAP), 2019[3]
- Brighton & Hove City Plan Part 1, 2016
- Brighton & Hove City Plan Part 2, 2022

1.3.3. Key local planning policies driving recommendations made in this report are summarised below, where they differ to national policy and legislation:

- Policy 8 of the Adur Local Plan (Adur District Council, 2017) requires developments to '*protect and enhance the areas important environmental assets and wildlife habitats, and in particular minimise impacts to the Adur Estuary SSSI'*;
- Policy 31 of the Adur Local Plan (Adur District Council, 2017) outlines that '*All development should ensure the protection, conservation, and where possible, enhancement of biodiversity… and protected and priority species*'.

[3] The JAAP forms part of the development plan for both Adur and Brighton & Hove and should be read in conjunction with the Adur Local Plan 2017, the Brighton & Hove City Plan Part 1 (2016) and the Brighton & Hove City Plan Part 2 (2022) Full details can be found at: https://www.adur-worthing.gov.uk/shoreham-harbour-regeneration/joint-area-action-plan/

- Policy SH7 of the Shoreham Harbour JAAP (2022) requires that all developments are required to include schemes to conserve, protect and enhance existing biodiversity such as the provision of bird nesting and bat roosting boxes.

2 METHODS

2.1 OVERVIEW

2.1.1. This PEA is based on the following data sources:

- An ecological desk study;
- A habitat survey;
- A protected/priority species assessment; and
- A preliminary bat roost assessment.

2.2 DESK STUDY

2.2.1. The desk study was undertaken in August 2024 to review existing ecological baseline information (**Table 2-1**). In addition, freely available aerial photography was consulted to show Site habitats and the local context. The scope of the data collection was proportionate to the potential impacts of the Proposed Development.

2.2.2. The ecological desk study was carried out by a qualifying member of CIEEM with a Basic level of competence in ecological assessment (CIEEM, 2021a), assisted by a Consultant Ecologist who is 'Capable' in carrying out ecological assessments and desk studies of this type.

2.2.3. The findings of the desk study are present in Section 3.2 for designated sites and habitats, and Section 3.4 for species, and are shown on **Figures 2-5**.

Table 2-1 – Desk Study Data Sources

Source	Record Type	Search Area
Sussex Biodiversity Record Centre	Protected and priority species	2km*
Sussex Biodiversity Record Centre	Bat species	2km*
Sussex Biodiversity Record Centre	Non-statutory site[4]	2km*
Natural England	Statutory sites designated under national legislation i.e. Local Nature Reserves (LNR), National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI)	2km
Natural England	Statutory sites designated at the international level (also including sites	10km

[4] An area without protection by the law, designated at a local level and protected by local and national policy (as defined in BSI (2013) Biodiversity Code of Practice BS42020).

Source	Record Type	Search Area
	classified under international conventions): National Site Network sites: Special Protection Area (SPA), Special Area of Conservation (SAC), potential SPA (pSPA) and candidate SAC (c.SAC); and Ramsar and potential Ramsar sites.	
Natural England Priority Habitat Inventory[5]	Habitats of Principal Importance (HPI)[6]	2km
Natural England (Ancient Woodland Inventory)[7]	Semi-natural ancient woodland and ancient replanted woodland	2km
Ordnance Survey Mapping	Waterbodies and watercourses and their direction of flow	500m
MAGIC	Protected Species Licencing	2km

*Search radius from National Grid Reference TQ22210511; all other search distances are from the site boundary (see **Figure 1**)

2.3 HABITAT SURVEY

2.3.1. A UK Habitat Classification survey was undertaken of all areas within the Site including boundary features as shown on the habitat plan (**Figure 6**). The survey was carried out on 7 August 2024. The weather during the survey was dry.

2.3.2. The habitat survey was carried out by a Consultant Ecologist who is 'Capable' (CIEEM, 2021a) in undertaking PEAs including surveys of a variety of greenfield and brownfield sites.

2.3.3. Habitats were described and mapped following the standard UK Habitat classification methodology (UKHab Ltd, 2023). Where appropriate, consideration was given to whether habitats qualify or could qualify as a 'Habitat of Principal Importance' (HPI) following habitat descriptions published by BRIG (JNCC, 2011) and The UK Habitat Classification Habitat Definitions Version 2.0 (UKHab Ltd, 2023), and whether they could classify as irreplaceable habitats, following the National Planning Policy Framework (NPPF) (Ministry of Housing Communities & Local Government, 2024) definition[8]. At the

[5] Inventories of UKBAP habitats which mostly align with Habitats of Principal Importance.

[6] Habitats listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, that are of principal importance for the conservation of biodiversity in England.

[7] The ancient woodland inventory in England lists areas over two hectares in size which have been continuously wooded since at least 1600.

[8] Irreplaceable habitats are defined in the NPPF as habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity, including ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

same time, habitat classification was carried out following the methodology in Defra's Biodiversity Metric [9]. The overall condition is presented in the Results section of this PEAR. This data will be supplied to the local records centre.

2.3.4. Habitats were recorded using mobile mapping GIS software and were subsequently digitised using a Geographical Information System (GIS).

2.4 PRELIMINARY BAT ROOST ASSESSMENT

2.4.1. Consideration was given to the identification of Potential Roost Features (PRFs) for bats in line with good practice guidelines (Collins, 2023). This included trees, structures and habitats within the Site boundary, plus an additional 10m buffer (hereafter the 'Survey Area'). Structures and overall habitat suitability were described in line with the PRF and habitat suitability descriptions in **Table 2-2** with trees described in line with the suitability guidelines outlined in **Table 2-3**. Where relevant, any PRFs of trees were described in line with suitability guidelines defined in **Table 2-4**. The PBRA was undertaken at ground level, and comprised an external inspection of any structures, buildings or trees present within the Survey Area using binoculars and a high-powered torch. The results of the PBRA are presented in Section 3.4.5.

[9] The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology.

Table 2-2 - Roosting, commuting and foraging habitat categorisation

Potential suitability	Roosting habitats in structures	Potential flight-paths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible[10]	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter protection, appropriate conditions[11] and/or suitable surrounding habitat to be used on a regular basis or by a larger number of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions[6] and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established as presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.

[10] Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute).

[11] For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.

Potential suitability	Roosting habitats in structures	Potential flight-paths and foraging habitats
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions[6] and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

Table 2-3 – Guidelines for assessing the suitability of trees to support roosting bats

Suitability	Description
NONE	Either no PRFs in the tree or highly unlikely to be any.
FAR	Further assessment required to establish if PRFs are present in the tree.
PRF	A tree with at least one PRF present.

Table 2-4 - Guidelines for categorising the potential suitability of tree PRFs

Suitability	Description
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

2.5 PROTECTED AND PRIORITY SPECIES ASSESSMENT

2.5.1. The potential for presence of legally protected and priority species (as defined in Section 1.2) in the Site was assessed using the desk study results, habitat survey results, and incidental field observations from the habitat survey. The assessment of habitat suitability for protected and priority species was based on professional experience and judgement. This was supplemented by standard sources of guidance on habitat suitability assessment for key faunal groups (CIEEM, 2021b).

2.6 NOTES AND LIMITATIONS

2.6.1. Every effort has been made to provide a comprehensive description of the Site; however, the following specific limitations apply to this assessment:

- Ecological survey data is typically valid for 18 months unless otherwise specified, for example if conditions are likely to change more quickly due to ecological processes, mobile species or anticipated changes in management (CIEEM, 2019).
- Records held by local biological record centres and local recording groups are generally collected on a voluntary basis; therefore, the absence of records does not demonstrate the absence of species, it may simply indicate a gap in recording coverage.
- The habitat survey was carried out over the period of a single day, as such only a selection of all species that occur within the Site will have been recorded. However, through use of desk study information to supplement site survey data, it is considered that an accurate assessment of the potential for the Site to support protected or priority species or habitats was possible.
- The habitat map (**Figure 6**) has been reproduced from field notes and plans. Whilst this provides a sufficient level of detail to fulfil the requirements of a PEA, the maps are not intended to provide exact locations of key habitats.
- Assessment of suitability for protected and priority species do not confirm that a species is present or absent, unless otherwise stated, and do not exclude the possibility of other protected or priority species being subsequently encountered. Recommendations are made where further surveys are needed to determine the baseline or mitigation requirements.
- During the PBRA of B1, the roof could not be fully inspected from the southern aspect due to perimeter fence, so it was assumed the roof structure is the same as on the northern aspect which was inspected fully. As such, this is not considered to be a significant limitation due to the roof composition and structure.
- During the PBRA, two buildings were identified within the Survey Area but outside of the Site boundary and were not able to be assessed due to lack of access. Further assessment of these buildings will be required prior to the commencement of the Proposed Development. Further details have been provided in **Table 4-1**.

3 RESULTS

3.1 SITE CONTEXT

3.1.1. A review of freely-available web-based aerial photography and mapping shows that the Site is located in a built up urban area along the coast. It is bounded by urban development of Shoreham-by-Sea to the north, with the River Adur estuary to the south. The Site supports habitat features typical of urban development, including:

- hard standing with scattered scrub / ruderal vegetation;
- buildings; and
- roadside grass verges.

3.2 DESK STUDY FOR DESIGNATED SITES AND HABITATS

DESIGNATED SITES

3.2.1. The designated sites identified in the desk study are shown in the tables below. The study did not identify any sites of European/international importance within 10km from the Site. Furthermore, the study found two sites of national importance and three statutory sites of local importance within 2km of the Site (**Table 3-1** and **Figure 2**).

3.2.2. A total of six non-statutory local sites were present in the desk study area (**Table 3-2** and **Figure 3**).

Table 3-1 – National Designated Sites within 2km

Site Name / Designation	Size (ha)	Location* and Orientation to Site	Site / Feature Summary
Shoreham Beach LNR	26.17	0.53km to S	A vegetated shingle on this beach is an internationally rare habitat that contains plants such as Yellow Horned Poppy *Glaucium flavum*, Sea Kale *Crambe maritima* and Curled Dock *Rumex crispus*.
Adur Estuary – Site of Special Scientific Interest (SSSI)	62.20	0.63km to W	The Adur Estuary, together with Rye Harbour further to the east, represent the only significant areas of saltmarsh between Chichester and Pagham Harbours in West Sussex, and Sandwich Bay in Kent. The estuarine plant communities are unusual due to the relative scarcity of cord-grass, *Spartina spp*. The large area of intertidal mudflats within the estuary are important for a variety of wading birds. Saltmarsh plants fringe most of the estuary and in places have colonised large areas of mudflats. Sea purslane *Halimione portaculoides* dominates most of the areas above mean high water mark, and annual seablite *Suaeda maritima* is also extremely frequent in these areas. Towards the mean low water mark, glasswort *Salicornia sp*. is dominant and sea aster *Aster tripolium* becomes more abundant. Other species are scattered throughout the saltmarsh community, including common sea lavender *Limonium vulgare*, thrift *Armeria maritima*, sea plantain *Plantago maritima* and sea poa grass, *Puccinella maritima*.

Site Name / Designation	Size (ha)	Location* and Orientation to Site	Site / Feature Summary
			Cord grass *Spartina spp*. is noticeably absent from most of the estuary, but a small stand does grow southeast of the Old Shoreham Bridge. At the landward margin of the saltmarsh a variety of herbs and shrubs are frequent, including mugwort *Artemisia vulgaris*, orache *Atriplex spp*., teasel *Dipsacus fullonum*, yarrow *Achillea millefolium* and elm *Ulmus procera*. The intertidal mudflats of the Adur Estuary support a number of wading birds, particularly redshank *Tringa totanus*, dunlin *Calidris alpina* and ringed plover *Charadrius hiaticula*. The number of ringed plover regularly exceed 1% of the total British population, making the estuary of national importance for this species. A variety of species breed within the reedbed adjacent to the estuary north of the A27, including moorhen, reed warbler and sedge warbler. The estuary embankment near the car park supports a large colony of viviparous lizards *Lacerta vivipara.*
South Downs National Park	162700.00	1.46km to N	The South Downs National Park is a site of national importance for landscape conservation, with a rich mosaic of habitats that supports many rare and internationally important wildlife species. Sheep-grazed downland is known for the chalk landscape with numerous rare plants such as the round-headed rampion *Phyteuma orbiculare*, burnt orchid *Neotinea ustulata*, early spider orchid *Ophrys sphegodes*, autumn lady's tresses *Spiranthes spiralis*, and butterflies including the Adonis blue *Polyommatus bellargus* and chalk hill blue *Polyommatus coridon*. The greensand of the Western Weald contains important lowland heathland habitats including the internationally designated Woolmer Forest, the only site in the British Isles where all native reptile and amphibian species are found. The park also contains numerous notable bird species such as the corn bunting *Emberiza calandra*, skylark *Alauda arvensis*, lapwing *Vanellus vanellus*, yellowhammer *Emberiza citrinella* and grey partridge *Perdix perdix*. The extensive chalk sea cliffs and shoreline in the East host a wide range of coastal wildlife including breeding colonies of seabirds such as kittiwakes *Rissa tridactyla* and fulmars *Fulmarus glacialis*.
Widewater Lagoon LNR	8.75	1.85km to SW	Widewater Lagoon lies to the north-west of Shoreham Beach. Widewater is a shallow micro-tidal lagoon which is an area of brackish water landlocked by a man-made shingle bank. It is home to herons Ardeidae, swans *Cygnus* and many other wildfowl.
Mill Hill LNR	13.49	1.9km to NW	Unimproved species rich chalk grassland, scrub, mature scrub and secondary woodland.

Site Name / Designation	Size (ha)	Location* and Orientation to Site	Site / Feature Summary
			One of the best butterfly sites in Sussex with over 29 species recorded. Chalk grassland is part of a Sussex habitat Action Plan and Mill Hill has over 160 recorded species of flowering plants and up to 30 recorded species per metre. Butterflies include Adonis Blue *Polyommatus bellargus*, a Species Action Plan species. The reserve is noted for its display of yellow horseshoe vetch *Hippocrepis comosa* in spring.

Table 3-2 – Non-statutory Local Designated Sites within 2km

Site Name / Designation	Size (ha)	Location*	Site / Feature Summary
Shoreham Beach - Local Wildlife Site (LWS)	24.80	0.53km to S	A number of notable plant species have been recorded in the LWS including Starry Clover and Yellow-vetch. The LWS is considered to be exceptional for invertebrates given the large number of notable species that have been recorded within the site; these include 18 beetles, 8 moths, 5 bugs and 5 spider species. Notable wintering bird species include Purple Sandpiper, Black Redstart and Rock Pipit.
Mill Hill - Designated Road Verge (DRV)	26.30	1.4km to N	Designated Road Verges (DRVs) are areas of roadside verge that have been designated for their special wildlife interest. They can hold spectacular displays of wild flowers, including rare orchids and other plant species indicative of old meadows, and can be of great importance to invertebrates and fungi. There is no statutory protection for road verges, but they can be found within both non-statutory and statutory designations.
Mill Hill LWS	31.80	1.47km to N	Contains Lowland Calcareous Grassland, a NERC S41 habitat. Notable or locally rare plant species recorded during the survey included round-headed rampion *Phyteuma orbiculare*, knapweed *Orobanche elatior* and red star-thistle *Centaurea calcitrapa*. In addition to calcicolous plants, a large number of notable invertebrate species have been recorded from the site. Of particular note are the many species of butterflies, moths and beetles, the former including many chalk grassland specialists, such as Chalk Hill Blue, Silver-spotted Skipper, Adonis Blue and Small Blue. A total of 81 bird species has been recorded from the area, including 17 NERC S41 species.
Widewater Lagoon LWS	8.20	1.86km to W	The lagoon is an area of open, brackish water, whose depth varies with seasons and tides but is generally very shallow. There is no emergent vegetation besides Glasswort *Salicornia sp.* and the alga *Chaetomorpha*. There are the remains of pond embankments by the bridge, and small islands. The saltmarsh is dominated by Glasswort, with Rock Samphire

Site Name / Designation	Size (ha)	Location*	Site / Feature Summary
			Crithmum maritimum, Sea Spurrey *Spergularia sp.* and patches of Sea Couch *Elymus pycnanthus*. The shingle is well vegetated, with Sea Kale *Crambe maritima*, Sea Beet *Beta vulgaris*, Yellow Horned poppy *Glaucium flavum*, Thrift *Armeria maritima*, Buckshorn Plantain *Plantago coronopus* and *Stonecrop Sedum sp*.. More typically 'land based' plants also occur, including Bramble *Rubus fruticosus*, Viper's Bugloss *Echium vulgare*, Colt's-foot *Tussilago farfara* and Ivy-leaved Toadflax *Cymbalaria muralis*. Grassy areas have Sea Coach, Thrift and Sea Carrot *Daucus carota subsp. gummifer*. Tamarisk and young Elms are occasional. The lagoon is used by wintering birds such as pochard *Aythya ferina* and redshank *Tringa totanus*, and was the only locality for the Anemone *Edwardsia ivelli*.
Adur Bridge Roundabout DRV	0.90	1.9km to NW	Designated Road Verges are areas of roadside verge that have been designated for their special wildlife interest. They can hold spectacular displays of wild flowers, including rare orchids and other plant species indicative of old meadows, and can be of great importance to invertebrates and fungi. There is no statutory protection for road verges, but they can be found within both non-statutory and statutory designations.
A27 Shoreham Bypass Holmbush Exit DRV	1.40	2km to NW	Designated Road Verges are areas of roadside verge that have been designated for their special wildlife interest. They can hold spectacular displays of wild flowers, including rare orchids and other plant species indicative of old meadows, and can be of great importance to invertebrates and fungi. There is no statutory protection for road verges, but they can be found within both non-statutory and statutory designations.

*Approximate location relative to Site boundary.

PROTECTED AND PRIORITY HABITAT RECORDS

3.2.3. **Table 3-3** shows any irreplaceable habitats[12] and HPI records from inventories within the study area (**Figure 4**) and the distance of these from the Site. No HPI were identified within the Site boundary, with mudflats HPI being the closest record approximately 0.14km to the south of the Site. No ancient woodland records were returned during the desk study.

[12] Irreplaceable habitats are defined in the NPPF (Ministry of Housing Communities & Local Government, 2023) as those which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

Table 3-3 – Protected and Priority Habitat Records

Habitat	No. Parcels/Area	Closest Area
Mudflats	21	0.14km to S
Good quality semi improved grassland[13]	133	0.2km to S
Coastal saltmarsh	56	0.21km to S
Coastal vegetated shingle	6	0.53km to S
Traditional orchard	1	0.55km to N
Deciduous woodland	16	0.77km to N
No main habitat but additional habitats present[14]	15	1.38km to W
Coastal and floodplain grazing marsh	10	1.48km to W
Saline lagoons	1	1.86km to SW

3.2.4. Aerial photography and OS mapping were checked for ponds and watercourses and showed a single waterbody, the River Adur, and an associated marina within the 500m buffer around the Site boundary (**Figure 5**). The river runs approximately 75m to the south from the Site boundary, flowing east where it enters the sea.

3.3 HABITAT SURVEY

3.3.1. The habitat types that were identified in the Site are shown on **Figure 6** and are listed and described in **Table 3-4**. Photographs are shown in **Appendix B**. Alpha-numeric codes used in this section cross-refer to the habitat classification, and the order of the habitat descriptions below reflects their ordering in the habitat manual and does not reflect habitat importance.

[13] Good quality semi-improved grassland is not classified as HPI under Section 41 of the NERC Act 2006, however this category comprises grasslands which have been historically identified (e.g. lowland meadows, lowland calcareous grassland, lowland dry acid grassland) that are now listed as HPI but which have not been recently assessed.

[14] This category comprises parcels where unspecified HPI has been recorded as present but not at sufficient densities to qualify as the main habitat within that parcel.

Table 3-4 – Habitat Areas and Descriptions

Habitat	Area (ha)	Condition	Summary Description	HPI?	Irreplaceable?
Modified grassland (g4)	0.0083	Poor	Species poor grassland with red fescue *Festuca rubra*, yarrow *Achillea millefolium*, common knapweed *Centaurea nigra*, hoary mustard *Hirschfeldia incana* and ribwort plantain *Plantago lanceolata* throughout. This is shown in **Photograph 4 and 5** in **Appendix B**.	No	No
Buildings (u1b5)	0.0475	N/A	A brick-built structure with corrugated metal cladding on the upper half. The roof is pitched and comprises of corrugated metal panels. The front of the building has large metal warehouse-style doors suited for its current use as a car repair and servicing garage. Damage to metal cladding, soffit and brickwork is apparent. This is shown in **Photograph 1** in **Appendix B**.	No	No
Other developed land, car park (u1b6, 804)	0.1603	N/A	The hardstanding mostly comprises of a car park at both the front and the rear of the on-Site structure described above. This is shown in **Photograph 2 and 3** in **Appendix B**.	No	No
TOTAL AREA (ha)	0.2161				

3.4 PROTECTED AND PRIORITY SPECIES ASSESSMENT

DESK STUDY

3.4.1. Records of protected or priority species relevant to the locality of the Site from the last 10 years, are summarised in **Table 3-5**. Records for the following species/species groups are not included below because these species are considered unlikely to use the Site or surroundings given the urban nature of the Site which comprises mostly hardstanding:

- Badger *Meles meles*;
- Hazel Dormouse *Muscardinus avellanarius*;
- Otter *Lutra lutra*;
- Water Vole *Arvicola amphibius*;
- Other priority mammals including European hedgehog *Erinaceus europaeus* and brown hare *Lepus europaeus*;
- Marine mammals including seal *Phoca vitulina*;
- Amphibians;
- Reptiles;
- Fish;
- Plants; and
- Invertebrates.

Table 3-5 – Protected and Priority Species

Species/Species Group	No. Records	Most Recent	Closest Record
Bats ■ Common pipistrelle *Pipistrellus pipistrellus*, ■ Serotine *Eptesicus serotinus*, ■ *Chiroptera*.	6	2021	0.9km to W
Birds (Schedule 1 on Wildlife and Countryside Act, 1981 (as amended)) include:	561	2022	0.7km to SE

Species/Species Group	No. Records	Most Recent	Closest Record
▪ Avocet *Recurvirostra avosetta* ▪ Black Tern *Chlidonias niger* ▪ Common Scoter *Melanitta nigra* ▪ Crossbill *Loxia curvirostra* ▪ Little Gull *Hydrocoloeus minutus* ▪ Little Ringed Plover *Charadrius dubius* ▪ Mediterranean Gull *Ichthyaetus melanocephalus* ▪ Red-throated Diver *Gavia stellata* ▪ Ruff *Calidris pugnax* ▪ Slavonian Grebe *Podiceps auritus* ▪ Spoonbill *Platalea leucorodia* ▪ Wood Sandpiper *Tringa glareola*			
Birds (SPIs, LBAPs, and BoCC amber and red listed) include: ▪ Black-headed Gull *Chroicocephalus ridibundus* ▪ Sandwich Tern *Thalasseus sandvicensis* ▪ Shelduck *Tadorna tadorna*	1102	2022	0.24km to SW

SUITABILITY ASSESSMENT

3.4.2. The potential for the Site and surrounding habitat to support legally protected and/or priority species is discussed for each species/species group below.

BATS

3.4.3. No records of bat roosts within 2km of the Site were returned during the desk study, however, six foraging bat records were identified for common pipistrelle, serotine and bats only identified to order level *Chiroptera*.

3.4.4. No records of European Protected Species (EPS) licences for bats were found within 2km of the Site within the last 10 years.

3.4.5. The Site does not provide suitable foraging habitat for bats due to its urban nature and limited vegetation. The building within the site has potential to support roosting bats and was assessed for its bat roost suitability during a ground-level external PBRA. Two buildings outside of the Site boundary but

within the Survey Area were not able to be assessed due to lack of access. The results of this survey are summarised in **Table 3-6** below and are shown on **Figure 7,** with photographs in **Appendix B**. No trees or other structures were identified within the Site.

Table 3-6 – PBRA Results

Building Reference	Description	Transitional Roost Suitability	Maternity Roost Suitability	Hibernation Roost Suitability	Overall Suitability
B1	The car servicing and repair garage within the Site. The building has numerous PRFs, with photographs in **Appendix B**. The PRFs comprise: 1. A gap approximately 5m from ground level on the south eastern corner of the building within the soffit which could lead to a cavity behind corrugated metal cladding. Access for bats is slightly limited but a good drop zone is present. This PRF is the same as PRF 5, 8 and 9 on different aspects. This is shown in **Photograph 6** in **Appendix B**. 2. A hole around a pipe on which may lead into a cavity behind the corrugated metal cladding on the south eastern aspect of building. This is shown in **Photograph 7** in **Appendix B**. 3. Missing/damaged soffit along south eastern aspect. Most sections appear to lead directly into the building. This is shown in **Photograph 8** in **Appendix B**. 4. A grate for an extractor pipe with no mesh on the southern aspect. Some small gaps around pipe could lead into cavity within brickwork. This is shown in **Photograph 9** in **Appendix B**.	Low	Negligible	Low	Low

Building Reference	Description	Transitional Roost Suitability	Maternity Roost Suitability	Hibernation Roost Suitability	Overall Suitability
	5. Soffit gap on edge on south western aspect corner which could lead into cavity behind corrugated metal cladding. This PRF is the same as PRF 1, 8 and 9 on different aspects. This is shown in **Photograph 10** in **Appendix B**. 6. A large gap within red soffit on south western corner which appears to lead into large metal cavity which may lead into cavity wall. This is shown in **Photograph 11** in **Appendix B**. 7. PRF 7 is the same as PRF 6 but on north western corner. This is shown in **Photograph 12** in **Appendix B**. 8. Soffit gap on edge on north western aspect corner which could lead into cavity behind corrugated metal cladding.8. This PRF is the same as PRF 1, 5 and 9 on different aspects. This is shown in **Photograph 13** in **Appendix B**. 9. Soffit gap on edge on north eastern aspect corner which could lead into cavity behind corrugated metal cladding.8. This PRF is the same as PRF 1, 5 and 8 on different aspects. This is shown in **Photograph 14** in **Appendix B**.				

BIRDS

3.4.6. **Table 3-5** outlines numerous records within the last 10 years of bird species, including waders and species found along the coast, due to the proximity of the Site to the coast and the Adur Estuary SSSI. As the Site is predominantly comprised of hardstanding, it is unlikely to support any birds listed under Schedule 1 of the Wildlife and Countryside Act 1981, Annex 1 of the Bird Directive, Section 41 of the NERC Act or Birds of Conservation Concern due to a lack of suitable habitat within the Site.

3.4.7. The Site may support common and widespread birds for nesting, such as wood pigeon *Columba palumbus*.

4 KEY ECOLOGICAL CONSIDERATIONS, OPPORTUNITIES AND RECOMMENDATIONS

4.1 OVERVIEW

4.1.1. This section first presents the key ecological considerations relevant to the Proposed Development, as drawn from the results section, and the implications they may have for the Proposed Development. The recommendations sub-section then sets out measures to avoid any identified features where possible. Where avoidance is not possible and/or further surveys or detailed assessment of potential effects are required to determine the biodiversity value of the site and / or appropriate mitigation measures, these are identified next. The following two sections outline preliminary mitigation and compensation measures that may be needed, where known. The final sub-section identifies requirements and opportunities for enhancement beyond the mitigation and compensation measures required to address ecological effects.

4.2 KEY ECOLOGICAL CONSIDERATIONS

DESIGNATED SITES

4.2.1. Adur Estuary SSSI is a key consideration for the Proposed Development due to its proximity to the Site. As the River Adur is tidal, any pollution incidents associated with construction activities could lead to negative impacts to the SSSI. Additionally, the Proposed Development is within the Adur Estuary SSSI Impact Risk Zone due to its proximity to the designated site. As current proposals include development of a residential block of up to 50 units, consultation between the Local Planning Authority and Natural England during the planning process is likely to be required to determine impacts the Proposed Development may have on the Site, including changes in water quality and potential recreational pressures.

4.2.2. None of the other designated sites identified in Section 3.2 of this PEA form a key consideration relevant to development due to distance from the Site and lack of connectivity or potential effect pathways.

4.2.3. SSSIs are subject to strict protection under the Wildlife and Countryside Act 1981 (as amended) (**Appendix A**).

4.2.4. Adverse effects could result from the construction and/or operation of the Proposed Development, depending on the design. The construction and operation of the Proposed Development will therefore need to be designed and implemented to avoid adverse effects to these sites.

4.2.5. Potential impacts from Proposed Development that could result in an adverse effect on Adur Estuary SSSI may include:

- Construction impacts such as airborne pollution and dust or runoff; and
- Operational impacts such as changes in water quality and recreational pressures.

4.2.6. The presence of mudflats and coastal saltmarsh HPI are a consideration for the Proposed Development. Due to the proximity of the coastal saltmarsh HPI to the Site it is at risk of being negatively impacted by construction related pollution.

4.2.7. HPI are listed under the NERC Act 2006 (as amended) as being of principal importance for the purpose of conserving or enhancing biodiversity, and therefore part of a public bodies' duty to further the general biodiversity objective (**Appendix A**).

4.2.8. Under current plans, no HPI habitats will be lost. However, retained habitats could be vulnerable to impacts during construction such as changes in water quality from runoff and dust pollution.

BIODIVERSITY NET GAIN

4.2.9. Under the legislative framework implemented by the Environment Act 2021 (**Appendix A**), most developments granted planning permission under the Town and Country Planning Act will be subject to the biodiversity gain condition, requiring them to achieve 10% Biodiversity Net Gain (BNG) for replaceable habitats, as measured using the Defra Biodiversity Metric. It is expected that, based on drawing 'KFSH-HMA-ZZ-ZZ-D-A-00003-S0-P05 – Proposed Site Plan' (**Appendix C**), the Proposed Development is likely to be exempt from mandatory BNG requirements under the de minimis exemption as it is likely to impact less than 25 square metres (5m x 5m) of on-site habitat (as detailed in **Appendix A**). However, even if exempt from mandatory BNG requirements, national planning policy requires that when determining planning applications, local planning authorities should apply principles including that opportunities to improve biodiversity should be integrated as part of the design, particularly where this can secure measurable net gains for biodiversity (as supported by Policy 31 of the Adur Local Plan 2017). If final designs indicate that more than 25 square metres of on-site habitat are impacted, the Proposed Development will be subject to the mandatory BNG requirement.

4.2.10. The BNG legislative framework requires the Biodiversity Gain Hierarchy to be followed. This hierarchy sets out a list of priority actions in relation to replaceable habitats of medium, high and very high distinctiveness, requiring that adverse effects are first avoided; and if they cannot be avoided then mitigated; and then any remaining adverse effects should be compensated for by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.

4.2.11. The baseline value of habitats within the red line boundary are used to determine the 10% gain requirement, and the requirement applies separately to area habitats, watercourses, and hedgerows/lines of trees. So, for example, if the red line boundary includes the area habitats, this will necessitate 10% BNG to be achieved for area habitats.

PROTECTED AND PRIORITY SPECIES

4.2.12. The results of the desk study, habitat survey and protected species assessment highlighted the potential presence of protected or priority species within the Survey Area. These species form key considerations for the Proposed Development. The legal protection afforded to these species is described in **Appendix A**.

Bats

- There may be potential for bat roosts to be present in the building within the Site;
- Bats are protected under the Habitats Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). Certain species of bats, including the Bechstein's bat, greater and lesser horseshoe bats, noctule bat, brown long eared bat and soprano pipistrelle bat are also listed as SPI. See **Appendix A** for a summary of the legislation;
- The Proposed Development could result in loss or damage to bat roosts if present in the on-Site building, B1, which is likely to be demolished.
- Therefore, bats are a key consideration for the Proposed Development and recommendations are made below with respect to these species.

Birds

- Habitat suitability for birds on Site is limited to the building, particularly on the roof or in areas which have been damaged, such as holes in the soffit. Species such as wood pigeon may nest on or within the building.
- All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended), and additional protection is extended to species listed under Schedule 1 such as avocet and others outlined in **Table 3-6.** Species such as lapwing and house sparrow *Passer domesticus* are listed as SPI in accordance with Section 41 of the NERC Act 2006. Species such as shelduck are amber listed species on the BoCC list as being of moderate conservation concern, and species such as swift *Apus apus* are red listed on the BoCC list as being of high conservation concern (Stanbury et al, 2021). The BoCC list does not confer additional protection under legislation or planning policy, however it provides a basis for informing evaluation of a Site and for targeting conservation effort and is a widely used resource for interpreting bird populations;
- Building demolition, depending on species present, could result in harm to nesting birds. Therefore, nesting birds are a key consideration for the Proposed Development and recommendations are made below with respect to these species.

4.3 RECOMMENDATIONS

4.3.1. Recommendations are provided where relevant under the following three sub-sections, and are summarised in **Table 4-1**:

- Additional surveys, assessment and consultation;
- Avoidance;
- Mitigation and compensation.

ADDITIONAL SURVEYS, ASSESSMENT AND CONSULTATION

4.3.2. Further survey for bats will be required as current plans impact building B1. Prior to the commencement of any demolition works of B1, a nesting bird check may be required. See **Table 4-1** for further details.

4.3.3. An assessment of ecological effects should be carried out as part of an EcIA once any further surveys are carried out and the design is finalised, to support the planning application.

4.3.4. Under current plans, the Proposed Development is expected to be exempt from mandatory BNG requirements (Section 4.2).

AVOIDANCE, MITIGATION AND COMPENSATION

4.3.5. General environmental protection measures should be implemented during the construction phase of the Proposed Development. Such measures include those that are outlined on the guidance pages on the government website[15], and those in the Construction Industry Research and Information Association (CIRIA) environmental good practice on site guide (Kwan *et al.*, 2023). The following general measures are recommended to prevent ecological impacts:

- A Construction Environmental Management Plan (CEMP) should be prepared prior to the start of construction, and followed throughout the duration of construction works to ensure the required mitigation measures are implemented;
- Measures must be taken to prevent dust, wind blown debris and other emissions from construction affecting protected sites, habitats and land beyond the Site;
- Chemicals and fuels must be stored in secure containers, and located away from drains, watercourses or waterbodies. Spill kits must be available;
- Excavations must be covered or securely fenced (with no potential access points beneath fencing) when the Site is closed (e.g. overnight), or ramps included, to prevent entrapment of animals;
- Habitats to be retained should be protected by fencing with clear signage throughout works;
- Biosecurity measures should be in place;
- Noise and vibration must be controlled and kept to the minimum necessary; and
- Lighting used for construction must be switched-off when not in use and positioned so as not to spill on to adjacent land or retained vegetation within the Site.

4.3.6. The following specific measures are also likely to be required:

- Consultation between the Local Planning Authority and Natural England will likely be required due to the number of proposed residential units (up to 50) and the proximity to the Adur Estuary SSSI;
- Demolition should be undertaken outside of the breeding bird season (generally March to August), with a pre-demolition check for nesting birds undertaken by a competent ecologist; and

[15] For example Pollution Prevention for Businesses [accessed https://www.gov.uk/guidance/pollution-prevention-for-businesses]

- If any loss or damage of bat roosts (if present) or disturbance to bats cannot be avoided, this will require a licence from Natural England and must include a scheme of mitigation and compensation.

4.3.7. If final designs indicate that the Proposed Development will be subject to mandatory BNG requirements, the Biodiversity Gain Hierarchy will need to be followed, as described in Section 4.2. In addition, adversely affected habitats will need to be compensated for following the biodiversity metric trading rules in order to achieve no net loss, before a net gain can be achieved. This requires, for example, that low distinctiveness habitats such as modified grassland will need to be compensated for by enhancement or creation of the same habitat type. Where habitats are lost, a larger area of an equivalent habitat type and condition will need to be created to compensate for the loss (as determined by the biodiversity metric). It is recommended that iterative BNG assessments are carried out throughout the design of the Proposed Development, to ensure that it is able to achieve BNG. A long-term (at least 30 years) management plan will be required to cover significant habitat creation and enhancement. The BNG design will need to be undertaken in accordance with the BNG good practice principles (CIEEM, CIRIA, IEMA, 2016) and the British Standard for BNG BS8683:2021 (BSI, 2021).

4.4 OPPORTUNITIES FOR ENHANCEMENT

4.4.1. The national and local policy relating to enhancements to improve biodiversity is set out in **Appendix A**. The Environment Act 2021 provisions with respect to Biodiversity Net Gain also require biodiversity to be enhanced, by at least 10% as measured by the Biodiversity Metric, as a result of development.

4.4.2. Enhancement measures should be tailored to local nature conservation objectives. The Shoreham Harbour JAAP states that development should incorporate bird nesting and/or bat roosting boxes.

4.4.3. Recommended enhancement opportunities which could be taken to increase the biodiversity value of the Proposed Development include the following, also summarised in **Table 4-1**:

- Sensitive/low UV lighting for bats
- Naturalistic/wildlife planting;
- Green walls and climbers;
- Biodiverse roofs;
- Bird and bat boxes;
- Invertebrate hotels, log piles, habitat piles;
- Good horticultural practice should be utilised, including the use of peat-free composts, mulches and soil conditioners and native plants with local provenance. Invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) or the Invasive Alien Species Order 2019 should not be planted; and
- An Ecological Management Plan should be implemented to ensure retained and created habitats are maintained and managed appropriately in the long-term to benefit biodiversity.

Table 4-1 – Summary of Preliminary Recommendations and Opportunities for Enhancement

Recommendation	Action	Timing
Further survey & assessment		
Survey for roosting bats	A single survey visit is required based on the low roosting suitability of B1, in accordance with Collins (2023). The survey will comprise day time, at-height endoscope surveys of PRFs where possible, and/or nighttime emergence surveys where endoscope surveys are not suitable.	At-height endoscope survey should be undertaken during the active season (May to August inclusive), to confirm presence or likely absence of roosting bats. It is also recommended that a pre-demolition check is undertaken immediately prior to the demolition of the structure. Nighttime emergence surveys must be undertaken between May and September and are optimal between May and August.
Ecological Impact Assessment	An EcIA must be carried out and reported using the results of the above recommended surveys, to assess likely impacts of the Proposed Development.	N/A
Mitigation and compensation		
Pollution prevention measures during construction	Standard pollution prevention measures including controlling dust and air borne pollution should be employed to avoid impacts on adjacent LWS.	During construction
Create habitats to compensate for those lost	Habitat creation will be required to compensate for any habitats lost, in order to achieve BNG.	Project design. Management plan may be required as a planning condition.
Enhancement		
Create additional roosting and foraging opportunities for bats	Install bat boxes and create foraging habitat as enhancement (in addition to any requirements to compensate/mitigate for effects on existing bat roosts determined following survey)	Project design
Manage amenity landscapes to maximise biodiversity	Avoid use of herbicides and pesticides. Implement an Ecological Management Plan	Long-term management

Recommendation	Action	Timing
	to ensure habitats are managed appropriately in the long term for biodiversity.	

5 REFERENCES

Technical references

- Adur District Council (2017). Adur Local Plan 2017.
- Amphibian and Reptile Groups of the United Kingdom (2010) ARG UK Advice Note 5: Great Crested Newt Habitat Suitability Index. ARG UK, UK;
- The Bat Conservation Trust (BCT) (2012a) Encouraging Bat – A Guide for Bat-friendly Gardening and Living. BCT, London;
- BCT (2014b) Artificial Lighting and Wildlife – Interim Guidance: Recommendations to help minimise the impact of artificial lighting. BCT, London;
- Bibby C.J, Burgess N.D, Hill D.A, Mustoe S.H. (2000) Bird Census Techniques. Second Edition. Elsevier Ltd;
- Brighton & Hove City Council (2016). City Plan Part One. Brighton & Hove City Council's Development Plan March 2016.
- Brighton & Hove City Council (2022). City Plan Part Two. Brighton & Hove City Council's Development Plan October 2022.
- British Standards Institution (2012) BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations. BSI, London;
- BSI (2013) Biodiversity code of practice for planning and development: BS42020. BSI. London;
- BSI (2015) Surveying for bats in trees and woodland – Guide: BS8596:2015. BSI, London;
- BSI (2021) Process for designing and implementing Biodiversity Net Gain. Specification: BS 8683:2021. BSI, London
- Chartered Institute of Ecology and Environmental Management (CIEEM) (2017a). Guidelines for Preliminary Ecological Appraisal. CIEEM, Winchester;
- CIEEM (2017b). Guidelines for Ecological Report Writing. CIEEM, Winchester;
- CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland, Terrestrial, Freshwater and Coastal. CIEEM, Winchester;
- CIEEM (2019) Advice Note on the Lifespan of Ecological Reports and Surveys. April 2019;
- CIEEM (2021a). Competency framework. CIEEM, Winchester;
- CIEEM (2021b) Good practice guidance for habitats and species. Version 3, May 2021;
- CIEEM, CIRIA, IEMA (2016) Biodiversity Net Gain: good practice principles for development;
- Collins J. (ed.) (2023) Bat Surveys for Professional Ecologists, Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London;
- DEFRA (2018) A Green Future: our 25 year plan to improve the environment;
- Department for Environment, Food and Rural Affairs (Defra) (2007) Hedgerow Survey Handbook: A Standard Procedure for Local Surveys in the UK, 2nd edition. Defra, London. Available at: http://www.defra.gov.uk/publications/files/pb11951-hedgerow-survey-handbook-070314.pdf;
- Department for Environment, Food and Rural Affairs (2011). A strategy for England's wildlife and ecosystem services. DEFRA, London;
- Defra (2023) Environmental Improvement Plan 2023: first revision of the 25 Year Environment Plan;
- Gilbert, G., Gibbons, D.W. and Evans, J. (1998). Bird Monitoring Methods: A Manual of Techniques for Key UK Species. RSPB;
- Highways Agency (1997) Design Manual for Roads and Bridges, Volume 10, Section 4, Part 7: Nature Conservation Advice in Relation to Reptiles and Roads;

- Highways Agency (1997) Design Manual for Roads and Bridges, Volume 10, Part 5, Mitigating against effects on badgers;
- JNCC Biodiversity Reporting and Information Group (2011). UK Biodiversity Action Plan Priority Habitat Descriptions (ed. Ant Maddock) 2008. (updated Dec 2011);
- JNCC and DEFRA (2012) UK Post 2010 Biodiversity Framework. Available online: https://hub.jncc.gov.uk/assets/587024ff-864f-4d1d-a669-f38cb448abdc. [Accessed August 2024];
- Kirby, P. (2001). Habitat Management for Invertebrates: A Practical Handbook. RSPB Management Guides;
- Kwan, J, Dickinson, C, Macleod, C (2023) Environmental good practice on site guide (fifth edition), C811. CIRIA, London;
- Ministry of Housing Communities & Local Government (2024) National Planning Policy Framework;
- Office of the Deputy Prime Minister (ODPM) (2005). Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impacts within the Planning System;
- Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield;
- Shoreham Harbour Joint Area Action Plan. Adopted October 2019.
- Stace, C.A. (2019) New flora of the British Isles 4th Edition. C&M Floristics, Suffolk;
- Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. (2021). The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds 114: 723-747. [Available online at https://britishbirds.co.uk/content/status-our-bird-populations]; and
- UKHab Ltd (2023) UK Habitat Classification Version 2.01.

6 FIGURES

Figure 1 – Site Location Plan

Figure 2 – UK Statutory Designated Sites within 2km

Figure 3 – UK Non-statutory Designated Sites within 2km

Figure 4 – Habitats of Principal Importance and Irreplaceable Habitats within 2km

Figure 5 – Waterbodies within 500m

Figure 6 – UK Habitat Classification Site Plan

Figure 7 - Preliminary Bat Roost Assessment Results

Appendix A

LEGISLATION AND NATIONAL POLICY CONTEXT

LEGISLATION AND NATIONAL POLICY CONTEXT

This appendix provides an overview and context of the below legislation and national policy and guidance, as applies in England.

Legislation:

- The Wildlife and Countryside Act 1981 (as amended) (the "WCA");
- The Invasive Alien Species (Enforcement and Permitting) Order 2019;
- Countryside and Rights of Way Act 2000 (the "CRoW Act");
- The Conservation of Habitats and Species Regulations 2017 (as amended) (the "Habitats Regulations");
- Environment Act 2021;
- The Natural Environment and Rural Communities (NERC) Act 2006 (as amended);
- The National Parks and Access to the Countryside Act 1949;
- The Wild Mammals (Protection) Act 1996;

National policy and guidance:

- The National Planning Policy Framework (NPPF) 2024;
- National planning policy guidance;
- Environmental Improvement Plan 2023;
- UK Post-2010 Biodiversity Framework (2011-2020); and
- UK Biodiversity Action Plans.

THE WILDLIFE AND COUNTRYSIDE ACT 1981, (AS AMENDED) (WCA)

The Wildlife and Countryside Act 1981 (as amended; hereafter referred to as the 'WCA') is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Bern Convention and (partially) the European Union Directives on the Conservation of Wild Birds (79/409/EEC) and Habitats Directive are implemented in the UK. The WCA includes provisions, amongst others, for the identification and designation of protected species; for the safeguarding and designation of Sites of Special Scientific Interest (hereafter referred to as SSSI); and for the designation of invasive non-native species and measures to control the spread of these.

Protected birds, animals and plants are listed under Schedules 1, 5, 8 respectively of the WCA. Schedule 9 lists non-native invasive species. A description of these Schedules and their meaning is provided below. Activities that would otherwise constitute an offence under this legislation may be licensed under certain circumstances by Defra or Natural England.

<u>Birds</u>

Under the WCA all birds, their nests and eggs (with exception of species listed under Schedule 2) are protected. It is an offence to:

- Intentionally kill, injure, or take any wild bird;
- Take or destroy an egg of any wild bird;
- Damage or destroy the nest of any wild bird (whilst being built, or in use).

Birds listed under Schedule 1 of the WCA[16] are afforded additional protection with regard to intentional or reckless disturbance whilst nest-building, or at a nest containing eggs or young, or disturb the dependent young of such a bird.

Protected animals

Species listed in Schedule 5 can either be fully protected or partially protected under Section 9, which makes it unlawful to intentionally or recklessly:

- Part 1: kill, injure or take;
- Part 2: possess or control (live or dead animal, part or derivative);
- Part 4 (a): damage or destruct any structure used for shelter or protection;
- Part 4 (b): disturb them in a place of shelter or protection;
- Part 4 (c): obstruct access to place of shelter or protection;
- Part 5 (a): sell, offer for sale, possess or transport for the purpose of sale (live or dead animal, part or derivative);
- Part 5 (b): advertise for buying or selling.

The Environment Act 2021 enables licences to be granted under section 16 of the WCA for reasons of over-riding public interest where there is no other satisfactory solution, and the grant of the licence is not detrimental to the survival of any population of the plant or animal species to which the licence relates. In addition, the Environment Act 2021 has amended section 10 of the WCA such that where a European Protected Species (ESP) licence is obtained under the Habitats Regulations and fully complied with, the above offences under the WCA no longer apply for that species.

Protected plants

The Act makes it an offence (subject to exceptions) to pick, uproot, trade in, or possess (for the purposes of trade) any wild plant listed in Schedule 8, and prohibits the unauthorised intentional uprooting of such plants.

Invasive species

Invasive animal species listed under Schedule 9 are prohibited from release into the wild under Section 14 of the WCA, and the Act prohibits planting or “causing to grow” in the wild of any plant species listed in Schedule 9. It should be noted that certain bird species listed on Schedule 1 of the WCA are also listed on Schedule 9 to prevent release of non-native and captive individuals, this includes barn owl, red kite, goshawk and corncrake.

SSSIs

SSSIs are subject to strict protection under the Wildlife and Countryside Act 1981 (as amended). Certain operations within SSSIs or affecting SSSIs require approval (known as assent); these are specific to each SSSI.

[16] To view the current list of Schedule 1 listed birds, visit: http://www.legislation.gov.uk/ukpga/1981/69/schedule/1

THE INVASIVE ALIEN SPECIES (ENFORCEMENT AND PERMITTING) ORDER 2019

This removes the Invasive Alien Species (IAS) of European Union concern from the scope of Sections 14 and 14ZA of the WCA, and brings all offences relating to species of European Union concern into one place under The Invasive Alien Species (Enforcement and Permitting) Order 2019. For animal species under this order, it is an offence to release or allow them to escape into the wild, and for plant species it is an offence to plant or otherwise cause them to grow in the wild.

Schedule 9A of the WCA is amended to ensure that species control agreements can be used for all species of European Union concern, including widely-spread invasive species.

COUNTRYSIDE RIGHTS OF WAY ACT 2000 (CROW ACT)

The CRoW Act has amended the WCA in England and Wales, strengthening the protection afforded to Sites of Special Scientific Interest (SSSI) and the legal protection for threatened species, and provides better management arrangements for Areas of Outstanding Natural Beauty (AONBs). It adds the word 'reckless' to the wording of the offences listed under Section 9(4) of the WCA. This alteration makes it an offence to recklessly commit an offence, where previously an offence had to be intentional to result in a breach of legislation.

CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2017 (HABITAT REGULATIONS)

The Conservation of Habitats and Species Regulations 2017 (as amended) consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales.

<u>European Protected Species (EPS)</u>

All species listed under Annex IV of the Habitats Directive require strict protection and are known as European Protected Species (EPS). Under Regulation 43 of the Habitats Regulations it is an offence to:

- Deliberately capture, injure or kill any wild animal of an EPS;
- Deliberately disturb wild animals of any such species*;
  *In particular any disturbance which is likely to a) impair their ability to survive, breed, reproduce, rear or nurture their young, hibernate or migrate, or b) affect significantly the local distribution or abundance of the species to which they belong.
- Deliberately take or destroy the eggs of such an animal; and
- Damage or destroy a breeding site or resting place of such an animal.

6.1.1. It is also an offence to be in possession of or to control, transport, sell or exchange, or offer for sale or exchange, any live or dead animal or part of an animal of an EPS which has been taken from the wild, or anything derived from such an animal or any part of such an animal.

6.1.2. If the ecologist determines that impacts to an EPS are unavoidable then the works may need to be carried out under a site specific mitigation licence from Natural England (NE). Activities that would otherwise constitute an offence under this legislation may be licensed by Natural England for certain purposes. Low Impact Class licences are also available for bats and great crested newts, enabling

Registered Low Impact Consultants to undertake certain low impact activities reducing the EPS application paperwork and process length. District licencing is also available for great crested newts.

National Site Network

Certain EPS are also listed under Annex II of the Habitats Directive and are designated and afforded protection under the Habitats Regulations by the establishment of core areas of habitat known as Special Areas of Conservation. This means these species are a relevant consideration in a Habitats Regulations Assessment (HRA). The Birds Directive seeks to maintain populations of all wild bird species across their natural range (Article 2). All bird species listed under Annex I[17] of the Birds Directive are rare or vulnerable and afforded protection by the classification of Special Protection Areas (SPAs), these are also designated under all regularly occurring migratory species, with regard to the protection of wetlands of international importance (Article 4). This means these bird species and communities are a relevant consideration in HRA.

The Habitats Regulations require projects or plans to be screened by the competent authority (usually the Local Planning Authority) for likely significant effects upon SPA, SAC and candidate SACs (cSACs). Guidance and policy also requires potential SPAs (pSPAs) and Ramsar sites be subject to the same assessment. If the competent authority is unable to conclude that significant effects are not likely, the Proposed Development must be subject to Appropriate Assessment in accordance with the Habitats Regulations.

ENVIRONMENT ACT 2021

The Environment Act legislates enhancing the environment through measures and targets for improving air quality and waste management, increase recycling, restoring habitats and preventing species decline. This includes a new legally binding target on increasing abundance of British species by 2030, makes a requirement for Local Nature Recovery Strategies, and updates the NERC Act 2006 (see below). The Act also sets out the requirement for the Secretary of State to prepare an Environmental Improvement Plan, and sets out a framework for mandatory Biodiversity Net Gain in England.

Section 98 of the Environment Act specifies that measures outlined in Schedule 14 of the Environment Act, to make provision for biodiversity gain to be a condition of planning permission in England, are to apply. Schedule 14 specifies that biodiversity gains are to be assessed using the metric published by the SoS and that a 10% gain will be mandatory. The Act requires that gains must be secured for a minimum of 30 years post completion of development. This is implemented through the insertion of Schedule 7A into the Town and Country Planning Act 1990, which provides the statutory framework. The Act includes this requirement for Nationally Significant Infrastructure Projects (NSIPs), being secured under Section 99 and Schedule 15 of the Planning Act 2008. It is expected that the mandatory requirement for a 10% gain for NSIPs will come into force in November 2025.

[17] To view birds listed under Annex I visit: http://ec.europa.eu/environment/nature/conservation/wildbirds/threatened/index_en.htm

As a result, under the Town and Country Planning Act 1990, every grant of planning permission is deemed to have been granted subject to the pre-commencement condition that the biodiversity gain objective is met ('the biodiversity gain condition'). The biodiversity gain objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. Secondary legislation includes a number of biodiversity net gain regulations which provide the detail around implementing mandatory BNG, including provisions around irreplaceable habitats, and amendments which set out the requirements of the Biodiversity Gain Hierarchy. It also sets out exemptions for categories of development to which biodiversity net gain does not apply, as follows:

- Householder development. Development which is subject of a householder application as defined within Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.
- Development granted planning permission by a development order under section 59. This includes permitted development rights.
- Development subject to the de minimis exemption. Development that does not impact a priority habitat and impacts less than 25 square metres of onsite habitat, and 5 metres of linear habitats such as hedgerows.
- Self-build and custom build development. Development which: consists of no more than 9 dwellings, and is carried out on a site which has an area no larger than 0.5 hectares, and consists exclusively of dwellings which are self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015.
- Urgent Crown development granted permission under section 293A of the Town and Country Planning Act 1990.
- Development of a biodiversity gain site. Development which is undertaken solely or mainly for the purpose of fulfilling, in whole or in part, the biodiversity gain condition which applies in relation to another development.
- Development related to the high speed railway transport network. Development forming part of, or ancillary to, the high speed railway transport network comprising connections between all or any of the places or parts of the transport network specified in section 1(2) of the High Speed Rail (Preparation) Act 2013.

NATURAL ENVIRONMENT AND RURAL COMMUNITIES (NERC) ACT 2006 (AS AMENDED)

The Natural Environment and Rural Communities Act (NERC Act) provides that any public body or statutory undertaker in England must have regard to the purpose of conservation of biological diversity in the exercise of their functions. The intention is to help ensure that biodiversity becomes an integral consideration in the development of policies and plans.

The Environment Act 2021 makes changes to the NERC Act which updates the general duty to conserve biodiversity by adding a duty to not only conserve but also enhance biodiversity. Public authorities are also expected to produce reports on the action they have taken under this duty when designated by the Secretary of State. Under Section 40 of this legislation, every public body (including planning authorities) must further the general biodiversity objective, which is described as

‘the conservation and enhancement of biodiversity in England through the exercise of functions in relation to England’.

Section 41 of the NERC Act requires the Secretary of State (SoS) to “publish a list of the living organisms and types of habitat which in the Secretary of State's opinion are of principal importance for the purpose of conserving biodiversity”. These are referred to as Habitats/Species of Principal Importance. The habitats and species listed in accordance with Section 41 largely replicate those listed on the UK Biodiversity Action Plan (BAP) which occur in England (however there are exceptions).

THE NATIONAL PARKS AND ACCESS TO THE COUNTRYSIDE ACT 1949

The Act provides the framework for the creation of National Parks, National Nature Reserves and Local Nature Reserves. The Act confers powers on the Nature Conservancy (a now defunct government body whose functions Natural England now perform) and local authorities: for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths; for securing access to open country; and to amend the law relating to PRoW.

THE WILD MAMMALS (PROTECTION) ACT 1996

This Act makes it an offence to use a variety of methods to intentionally cause suffering to a wild mammal. It is an offence to mutilate, kick, beat, nail (or otherwise impale), stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering. It also has exemptions, related to euthanasia.

NATIONAL PLANNING POLICY FRAMEWORK 2024

The National Planning Policy Framework 2024 (the ‘NPPF’) sets out the Government’s planning policies for England and it contains relevant policies specific to biodiversity and nature conservation (most notably in section 15). It sets out provisions for biodiversity, including protected sites and species, for which local planning authorities (LPAs) must have regard.

The NPPF requires local authorities in England to take measures to:

- Protect and enhance sites of biodiversity;
- Recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services;
- Maintain the character of the undeveloped coast;
- Minimise impacts and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability; and
- Remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

When determining planning applications, local planning authorities should apply principles including:

- If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- Typically refusing development on land within or outside a Site of Special Scientific Interest that is likely to have an adverse effect on it (either individually or in combination with other developments). The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- Typically refusing development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) unless there are wholly exceptional reasons (for example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat), and a suitable compensation strategy exists. Irreplaceable habitats are defined in the glossary as: "*habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen*"; and
- Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Planning Practice Guidance (PPG) has been published alongside the NPPF, and is regularly updated, to provide guidance on the implementation of the planning policies. It is also a matter of government policy under the NPPF that Ramsar Sites are given the same protection as European Sites (habitats sites), and therefore should be considered in the HRA process.

NATIONAL PLANNING PRACTICE GUIDANCE (PPG)

Explains the processes and tools that can be used through the planning system in England. In relation to terrestrial biodiversity, guidance on Appropriate Assessment (i.e. the assessment of effects on sites designated under the Conservation of Habitats and Species Regulations 2017), BNG, and Environmental Impact Assessment are relevant, alongside the "Biodiversity, Geodiversity and Ecosystems" section of the Natural Environment guidance section. It states that a key purpose of a public authorities' duty under the NERC Act 2006 is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector, which should be seeking to make a significant contribution to the achievement of the commitments made by government in its 25 Year Environment Plan.

The guidance advises how to identify suitable mitigation and adaptation measures in the planning process. This would require the implementation of appropriate measures by the local planning authorities. The guidance particularly recommends development of brownfield sites over greenfield sites, implementation of green infrastructure networks in development, avoidance of effects on important ecological sites and species and use of appropriate mitigation where necessary.

The BNG PPG sets out the statutory framework for mandatory BNG.

ENVIRONMENTAL IMPROVEMENT PLAN 2023 (DEFRA, 2023)

This is the government's first revision of its 25 Year Environment Plan. It sets out a new plan for delivering ten goals to improve the environment, with interim targets to measure progress. Part of the plan includes new National Nature Reserves, Nature Recovery Networks, implementing the Environment Act 2021 including Local Nature Recovery Strategies and Biodiversity Net Gain. The apex goal is to improve nature, with other goals to help achieve it including:

- Goal 1 - Thriving plants and wildlife
- Goal 2 - Clean air
- Goal 3 - Clean and plentiful water
- Clean 4 - Managing exposure to chemicals and pesticides
- Goal - 5 Maximise our resources, minimise our waste
- Goal 6 - Using resources from nature sustainability
- Goal 7 - Mitigating and adapting to climate change
- Goal 8 - Reduced risk of harm from environment waste
- Goal 9 – Enhancing biosecurity
- Goal 10 – Enhanced beauty, heritage and engagement with the natural environment

THE UK POST-2010 BIODIVERSITY FRAMEWORK (2011-2020) (JNCC AND DEFRA, 2012)

The UK Post-2010 Biodiversity Framework covers the period from 2011 to 2020 and was developed in response to two main drivers: the Convention on Biological Diversity's Strategic Plan for Biodiversity 2011-2020, and its five strategic goals; and 20 'Aichi Targets'. The Framework lists the UK's most threatened species and habitats and sets out targets and objectives for their management and recovery. The targets set in this framework are still valid, even though the period has now elapsed. The Biodiversity Framework shows how the work of the four UK countries joins up with work at a UK level to achieve the 'Aichi Targets' and the aims of the EU Biodiversity Strategy. It identifies the activities required to complement each country's biodiversity strategy, and where work in the country strategy contributes to international obligations.

UK BIODIVERSITY ACTION PLANS

The United Kingdom Biodiversity Action Plan (UKBAP) has been replaced by the UK Post-2010 Biodiversity Framework, however, it contains useful information on how to characterise important species assemblages and habitats which is still relevant. The UKBAP, first published in 1994 and updated in 2007, is a government initiative designed to implement the requirements of the Convention of Biological Diversity to conserve and enhance species and habitats. The UKBAP contains a list of priority habitats and species of conservation concern in the UK, and outlines biodiversity initiatives designed to enhance their conservation status. The priority species generally correlate with those listed in accordance with Section 41 of the NERC Act (with some exceptions).

BAPs in the UK have no statutory status but provide a framework for implementing conservation requirements. Species listed as Priority species in the UK BAP which are also listed as Species of Principal Importance are afforded a degree of protection under the NERC Act (2006) (see above).

The national BAP is supplemented by local BAPs which identify habitats and species of particular value or concern at the local level.

Appendix B

PHOTOGRAPHS

PHOTOGRAPHS

Photograph 1 – On-Site building

Photograph 2 – Car park to north of Site

Photograph 3 – Car park to south of Site

Photograph 4 – Modified grassland (g4) parcel

Photograph 5 – Modified grassland (g4) parcel

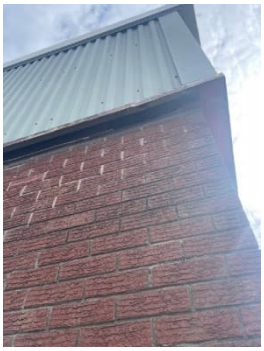
Photograph 6 – PRF1

Photograph 7 – PRF 2

Photograph 8 – PRF 3

Photograph 9 – PRF 4

Photograph 10 – PRF 5



Photograph 11 – PRF 6

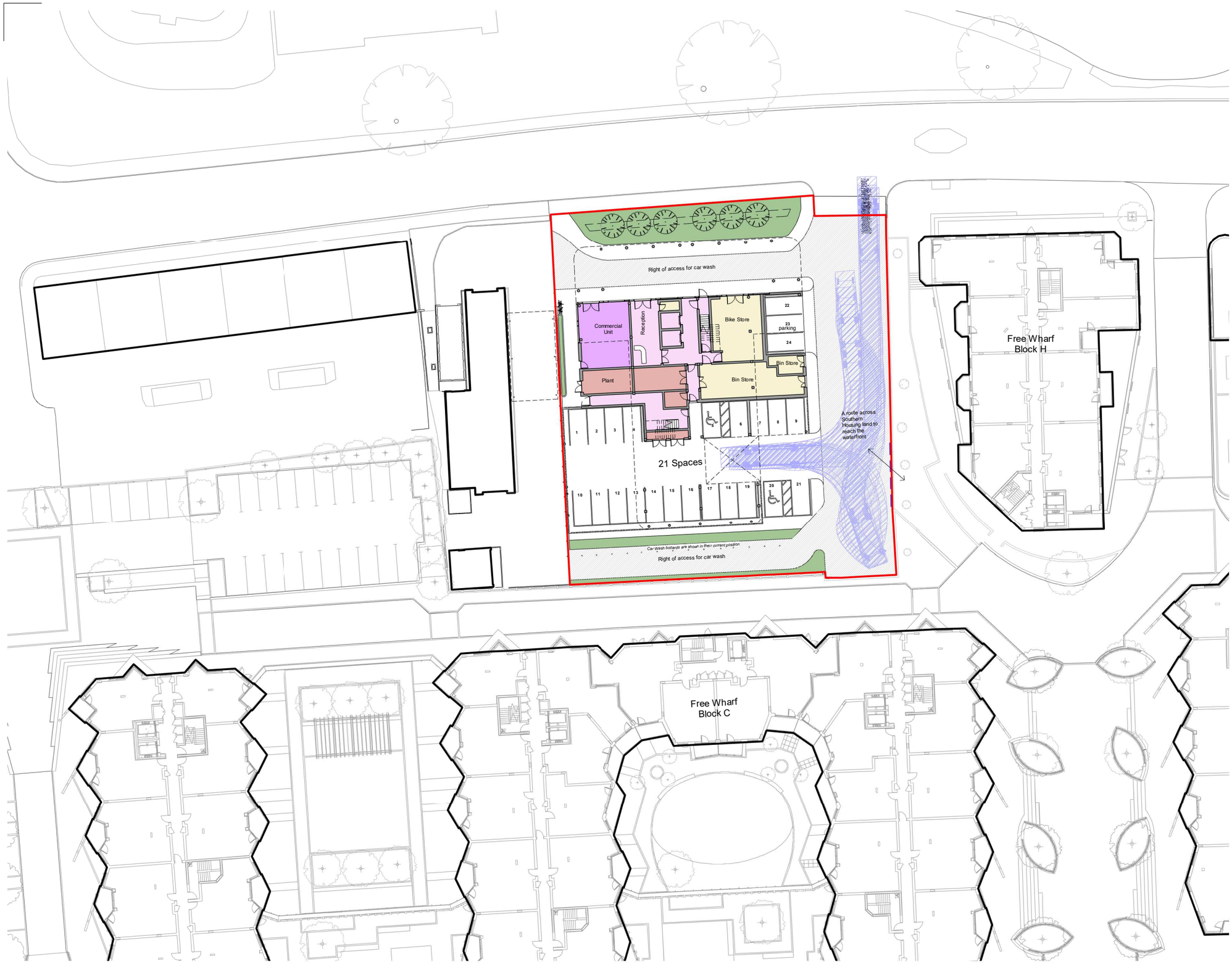
Photograph 12 – PRF 7

Photograph 13 – PRF 8

Photograph 14 – PRF 9

Appendix C

PROPOSED SITE PLAN



1 **Proposed Site Plan**

1 : 500

5 0 5 10 15 20 25

SCALE 1:500 m

N

Note:

1. The site plan within the site boundary is based on survey drawings completed in March 2024.
2. The Free Wharf plan is indicative only, relying on the latest publicly available drawings.
3. Structural, M&E and Landscape elements are only illustrative at this stage and will be developed by the relevant consultants at a later stage.

Rev	Status	Date	Check	Description
P05	S0	28.04.25	NC	Ground Floor layout amended, parking numbers increased, the main core mirrored.
P04	S0	12.12.24	NC	Undercroft extended
P03	S0	25.09.24	NC	Landscape strip and bin stores amended
P02	S0	10.09.24	NC	General Amendments
P01	S0	29.08.24	NC	First Issue

HolderMathias architects

T +44 (0) 20 7287 0735
www.holdermathias.com
London Cardiff Munich

Project
Shoreham-by-Sea
37-41 Brighton Road
Blenheim Estates

Title
Proposed Site Plan

Job No	Scale at A3	Classification	Status Revision
4713	As indicated	PM_40_40_34	S0 P05

Project - Originator - Functional Breakdown - Spatial Breakdown - Form - Discipline - Number
KFSH-HMA-ZZ-ZZ-D-A-00003

2 London Square
Cross Lanes
Guildford, Surrey
GU1 1UN

wsp.com